

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION

BIG BINDER EXPRESS, LLC AND
RAYMOND GOODLIN

Plaintiffs

V.

CAUSE NO.: 3:19-cv-022-MPM-RP

LIBERTY MUTUAL FIRE INSURANCE COMPANY;
KEITH GLOVER; AND DAVIAN LEE, INDIVIDUALLY
AND AS PERSONAL REPRESENTATIVE OF GERALD
GLOVER, DECEASED, AND ON BEHALF OF ALL THOSE
ENTITLED TO RECOVER UNDER THE WRONGFUL
DEATH AND SURVIVAL STATUTE

Defendants

ANSWER OF KEITH GLOVER TO PLAINTIFFS' COMPLAINT
FOR DECLARATORY JUDGMENT

COMES NOW the Plaintiff, Keith Glover, by and through counsel, and files this his
Answer to Plaintiffs' Complaint for Declaratory Judgment and states as follows:

AFFIRMATIVE DEFENSE

Defendant, Keith Glover, avers that he is entitled to benefits under the policy of insurance
issued by Defendant, Liberty Mutual Fire Insurance Company to Darling Ingredients, Inc., and to
benefits under policy of insurance issued by Northland Insurance to Plaintiff, Big Binder
Express, LLC.

1. Paragraph 1 of the Complaint is admitted.
2. Paragraph 2 of the Complaint is admitted.

3. Paragraph 3 of the Complaint is admitted.
4. Paragraph 4 of the Complaint is admitted.
5. Paragraph 5 of the Complaint is admitted.
6. Paragraph 6 of the Complaint is admitted.
7. Paragraph 7 of the Complaint is admitted.
8. Paragraph 8 of the Complaint is admitted.
9. Paragraph 9 of the Complaint is admitted.
10. Paragraph 10 of the Complaint is admitted.
11. Paragraph 11 of the Complaint is admitted.
12. Paragraph 12 of the Complaint is admitted.
13. Paragraph 13 of the Complaint is admitted.
14. Paragraph 14 of the Complaint is admitted.
15. Paragraph 15 of the Complaint is admitted.
16. Paragraph 16 of the Complaint is admitted.
17. Paragraph 17 of the Complaint is admitted.
18. Paragraph 18 of the Complaint is admitted.
19. Paragraph 19 of the Complaint is admitted.
20. Paragraph 20 of the Complaint is admitted.
21. Paragraph 21 of the Complaint is admitted.
22. Paragraph 22 of the Complaint is admitted.
23. Paragraph 23 of the Complaint is admitted.
24. Paragraph 24 of the Complaint is admitted.

25. Paragraph 25 of the Complaint is admitted.

26. Paragraph 26 of the Complaint is admitted.

27. Paragraph 27 of the Complaint is admitted.

28. Paragraph 28 of the Complaint is admitted.

29. Paragraph 29 of the Complaint is admitted.

30. Paragraph 30 of the Complaint is admitted.

31. Paragraph 31 of the Complaint is admitted.

32. Paragraph 32 of the Complaint is admitted.

33. Paragraph 33 of the Complaint is admitted.

34. Now answering the paragraph beginning “WHEREFORE, THE ABOVE PREMISES CONSIDERED, Glover admits that the Plaintiffs are entitled to the relief requested including the entry of a declaratory judgment as stated therein.

WHEREFORE, PREMISES CONSIDERED, Defendant, Keith Glover, prays that this court enter a declaratory judgment against Defendant, Liberty Mutual Fire Insurance Company, as prayed for in Plaintiffs’ Complaint.

Respectfully submitted,

SPARKMAN-ZUMMACH, P.C.

S/Gregory Morton

Martin Zummach, #9682

Gregory C. Morton, #10562

Attorney for Keith Glover

7125 Getwell Road, Ste. 201

Southaven, MS 38671

662-349-6900

Certificate of Service

The undersigned does hereby certify that he has this day emailed a true and correct copy of the foregoing document to: Edward Currie, ecurrie@curriejohnson.com and Joseph Gill, jgill@curriejohnson.com on this the 10th day of March, 2019.

S/Gregory C. Morton